



FILED
GARFIELD COUNTY OKLA.

IN THE DISTRICT COURT OF GARFIELD COUNTY
STATE OF OKLAHOMA

10-2-2014

CALVARY BAPTIST CHURCH,

Plaintiff,

vs.

CHURCH MUTUAL INSURANCE COMPANY,

Defendant.

Case No.

CJ - 2014 - 222-02

MARGARET JONES
CLERK
DEPUTY COURT CLERK

PETITION

COME NOW the Plaintiff, Calvary Baptist Church, and for its cause of action against the Defendant, Church Mutual Insurance Company, states as follows:

JURISDICTION AND VENUE

1. The Plaintiff, Calvary Baptist Church, is an unincorporated church in Garfield County, Oklahoma.
2. The Defendant, Church Mutual Insurance Company, is a Wisconsin Insurance Company doing business in Garfield County, Oklahoma.
3. The causes of action asserted herein arose in Garfield County, Oklahoma.
4. The District Court of Garfield County, Oklahoma has jurisdiction over the parties and claims asserted herein.
5. The District Court of Garfield County is the proper venue of this action.

GENERAL ALLEGATIONS

6. The Plaintiff, Calvary Baptist Church, obtained property and casualty insurance from the Defendant, Church Mutual Insurance Company.
7. In the Summer of 2013, the Plaintiff sustained property damages as a result of vandalism.
8. On or about June 1, 2013, the Plaintiff sustained damages as a result of severe

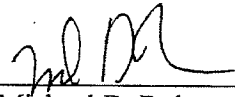


weather.

9. The Plaintiff filed a claim for the damages it incurred with the Defendant.
10. The Defendant has refused, failed or neglected to pay the Plaintiffs the amount due under their insurance policy with Defendant.
11. The Defendant has breached its agreement with the Plaintiff.
12. The Plaintiff is entitled to judgment against the Defendant for actual damages in excess of \$10,000.00.
13. The Plaintiff is entitled to its reasonable costs and attorney fees in prosecuting the case.

WHEREFORE, premises considered, the Plaintiff prays for judgment against the Defendant, Church Mutual Insurance Company, in an amount in excess of \$10,000.00 for actual damages; and for such other and further relief as is just and equitable.

Respectfully submitted,



Michael D. Roberts, OBA #13764
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Enid, Oklahoma 73701
Attorney for Plaintiff

ATTORNEY'S LIEN CLAIMED